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August 18, 2005

Sharla Dillon, Docket Room
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE IBFA Acquisition Company, LLC
Docket No 05-00151

Dear Ms. Dillon:

In accordance with the request of Darlene Standley, enclosed for filing with the Regulatory Authority, please find an original and thirteen (13) copies of the response to the July 7, 2005 request for additional information.

Also enclosed is an exact duplicate of this letter. Please date-stamp the duplicate and return same to me in the enclosed postage-paid envelope.

Please contact the undersigned should you have any questions or concerns.

Very truly yours,

EARLY, LENNON, CROCKER & BARTOSIEWICZ, P L C.

Patrick D. Crocker

PDC/bmr

enc

- 1 Please clarify the statement in Exhibit F that "IBFA was organized on May 25, 2004 and has not yet begun to provide service in any jurisdiction." The Balance Sheet for the period ending February 28, 2005 indicates accounts receivable and retained earnings. Are these amounts for services provided by IBFA through February 28, 2005? Also, please clarify the Statement of Earnings indicating sales of local and long distance in the amount of approximately \$700,000, as well as "carrier costs" of approximately \$68,000.

Response: The financials attached to the original application reflect Applicant's true financial position as of that date consistent with the Asset Purchase Agreement executed between Applicant and American Farm Bureau, Inc. Applicant currently provides service in numerous jurisdictions throughout the country in which regulatory approval has been granted.

2. Please identify the carrier referenced in your Revised Exhibit A, filed on June 30, 2005, indicating an Asset Purchase Agreement and application to approve the transfer of this carrier's assets which will be forthcoming.

Response: American Farm Bureau, Inc.

3. Please identify any sources of funding for IBFA's Tennessee network, including loan commitments, available cash, etc. These amounts are not considered to be included in the \$20,000 Letter of Credit (Exhibit H), which is intended to secure the payment of any monetary sanction imposed in any enforcement proceeding brought under this title or the Consumer Protection Act of 1990, by or on behalf of the authority

Response: IBFA maintains a \$500,000 line of credit with Des Plaines National Bank. IBFA has \$500,000 available under this credit facility. IBFA intends to resell the underlying network facilities of various facilities based carriers in Tennessee. As such, IBFA will not incur substantial network costs for Tennessee operations.

4. The 36-month forecasted expenditures provided include \$250,000 "Purchase Installments" in Month 6 and Month 14 as well as amounts totaling \$48,000 for "Equipment Purchase." Please clarify the statements in Exhibit G "Capital Expenditures Budget" that "Applicant will deploy no equipment for this service offering" and "Applicant will have no cost, as it will deploy no equipment."

Response: Applicant does not intend to deploy equipment in order to provide service to Tennessee customers. The "Equipment Purchase" item includes estimates to upgrade computer hardware, computer software, and servers. None of this equipment will be located or used in Tennessee. Competition dictates Applicant's consideration of such possibility. Applicant provides for such consideration by conservatively including such potential costs in all current forecasts.

The "Purchase Installments" relate to the acquisition of certain assets of American Farm Bureau, Inc., including, but not limited to, the customers base.

5. CLECs are required, by statute, to demonstrate their managerial, technical, and financial abilities to provide the services for which they seek authority. Please provide more detailed information regarding specific past experience of the officers listed in Exhibit E, to assure the requisite abilities in these areas.

Response: Casimir Wojciechowski, envisioned, developed, and continues to oversee a very successful multi-jurisdictional local service program for American Farm Bureau, Inc. Mr. Wojciechowski developed and implemented this business plan, involving himself in all aspects in order to ensure success. As Applicant's President, Mr. Wojciechowski will oversee all of Applicant's operations.

Mr. Grabowski graduated from the University of Illinois with a finance degree. Mr. Grabowski has been recognized for his academic excellence. In 1993, Mr. Grabowski was entered into the GTE Academic All American Hall of Fame.

In addition to the aforementioned officers, Applicant also employs the following:

Years of Telecommunications Experience

Anitra Thomas - Provisioning Rep	15
John Palmer - IS Manager	10
Judy Tuytens - Customer Service Supervisor	10
Gloria Damjanovic - Customer Service Rep	3
Mary Perkins - Customer Service Rep.	5
Monique Fletcher - Customer Service Rep	5
Sandra Regan - Customer Service Rep.	1
Katerina Woodards - Customer Service Rep.	3